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February 13, 2019

**Via ECF**

The Honorable Loretta A. Preska  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 2220  
New York, NY 10007

**Re: *Sadowski v. JSN Global Media, Inc.*, No. 18-cv-01392 (LAP)**

Dear Judge Preska:

On behalf of defendant JSN Global Media, Inc. ("JSN"), we submit this letter to include the full material that JSN intended to include in its joint letter and which was sent to the Liebowitz Firm with permission to use my signature if all three paragraphs sent were included. Upon reviewing the ECF notification (Dkt. No. 36), we discovered that plaintiff's firm chose to omit the last paragraph, which reads as follows (*italics added for clarity*):

*Not only does the Liebowitz Firm not appear to be taking this matter seriously, but given the Offer of Judgment and the risk that Plaintiff may end up needing to pay a significant amount of fees – indeed, well beyond the \$10,000 bond that Plaintiff's counsel was ordered to post – Defendant respectfully requests that this Court take steps to curtail the resources spent in litigation and send the parties, including the Plaintiff who is styled as a working-class photographer seems unaware of the potential cost that he may need to bear, to mediation. Defendant is amenable to any other solution that the Court deems just in this truly disappointing situation that seeks to burden a tribunal that has already seen too much gamesmanship from the Liebowitz Law Firm.*

While we can understand why plaintiff's firm would have omitted the paragraph, it is material to the report and the views regarding the appropriate next steps. Accordingly, JSN respectfully requests that the aforementioned paragraph be considered as part of the letter that plaintiff filed this evening.

Respectfully submitted,

Eleanor M. Lackman

cc: All counsel of record